Audit of Timber Harvesting and Road Construction, Maintenance and Deactivation

Mid Coast Forest District

Small Business Forest Enterprise Program

FPB/ARC/31

November 2000

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Report from the Board

A. Report from the Board

This is the Board's report on a limited scope compliance audit[1] of the Mid Coast Forest District Small Business Forest Enterprise Program (SBFEP). The Mid Coast District covers an area on the mainland coast from Cape Caution in the south to Sheep Passage in the north (refer to attached map). The audit examined the SBFEP's operational planning (including forest development plans, silviculture prescriptions, and logging plans); timber harvesting; and road construction, maintenance and deactivation activities for the period of August 9, 1998, to August 31, 1999.

The Report from the Auditor (Part C) provides further details on the operating areas of the SBFEP, the scope of the audit, and the audit findings. The Report from the Auditor is based on the audit procedures described in Part B.

Before completing this report, the Board considered written representations from the Mid Coast Forest District as required under section 182 of the *Forest Practices Code of British Columbia Act* (the Act). The Board also considered the Report from the Auditor along with supporting audit evidence. Based on its analysis of this information, the Board affirms the auditor's report and provides the following conclusions and recommendations.

Conclusions

The Mid Coast Forest District SBFEP's timber harvesting and road construction, maintenance and deactivation practices generally complied with Forest Practices Code (*Forest Practices Code of British Columbia Act* and related regulations) requirements as of August 1999. The only significant non-compliance involved harvesting practices along the marine foreshore and road construction adjacent to a fish-bearing stream.

Timber Harvesting – A-Frame Logging[2]

The audit identified significant non-compliance involving two adjacent cutblocks logged using an A-frame. The non-compliance involved wood debris being deposited along the inter-tidal and sub-tidal zones of the marine foreshore. The approved logging plans for each cutblock required that all debris from harvesting be left above the high-water mark.

The depositing of these large concentrations of wood debris has resulted in the smothering of sensitive marine habitat, such as eelgrass beds. Eelgrass beds are highly productive marine ecosystems that provide habitat for a wide range of fish, plant and animal species. Smothering of this marine habitat will impact those species for a significant period of time.

During the audit period, 15 cutblocks were logged using an A-frame. Of those, two cutblocks were underwater assessed as part of the audit; the other 13 cutblocks were not underwater assessed. The significant non-compliance was found on the two cutblocks that were underwater assessed.

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1 Part B of this document provides background information on the Board's audit program and the process followed by the Board in preparing its report.

2 A-frame logging is a method of harvesting which uses a yarder on a barge to yard logs from the shore into the ocean. A-frame log sales are generally less than ten hectares in size.

The district has advised the Board that, since the audit, it has made the following changes to its A-frame logging practices:

- The district carries out more focussed enforcement to ensure that logging and yarding debris is not placed below the high-water mark.
- The district conducts post-harvest dive assessments on a sample of harvested water-based cutblocks to determine if sensitive marine habitats have been impacted.

In addition to the above actions, the district, in consultation with the Department of Fisheries and Oceans (DFO), plans to investigate and take appropriate action to address the non-compliance associated with the two A-frame cutblocks examined during the audit.

Road Construction – Stream Classification

The audit identified a situation of significant non-compliance with the Code involving the construction of a road adjacent to a fish-bearing stream. The road layout and design for the road did not reflect that the adjacent stream was fish-bearing; and after the stream misclassification was identified, the road layout and design was not amended to reflect the correct classification. The incorrect classification of the stream led to the non-compliance, which included constructing the road within the riparian management area of the stream, altering the stream banks and parts of the streambed, and piling timber on the stream. The non-compliance was significant because fish habitat was harmed as a result of the road construction activities. The district should ensure that road layout and designs accurately reflect correct stream classifications.

The non-compliance also included installing metal culverts where wood culverts were prescribed, building stream crossings outside of approved timing windows, impeding fish passage, and causing sedimentation of the stream. The audit identified that the approved road layout and design was not implemented as planned. The Board is concerned that the district does not adequately administer the implementation of approved road layouts and designs in the SBFEP. The Board considers that there is a need for better monitoring by the district, as well as follow-up on non-compliant practices, to ensure that road construction does not cause damage to streams. The Board recognizes that access to the SBFEP operating areas is challenging for the district, due to the remoteness of the areas, however, that does not justify inadequate monitoring of forest practices in these areas.

The district has informed the Board that it has carried out the following actions:

- The district has developed and implemented a new procedure whereby it examines all existing road layouts and designs according to a thorough checklist prior to road construction, in order to ensure they reflect current and accurate site information, including stream classifications.
- The district has removed the logs that were placed on top of the stream during harvesting and the introduced woody debris from the stream.
- The district has conducted a field trip with Ministry of Environment, Lands and Parks (MELP) staff to determine if additional remedial work is required to rehabilitate the stream identified in the finding of significant non-compliance. The district has developed a plan to carry out the remedial actions identified as being necessary and is seeking input from MELP and DFO staff.

Recommendations

The Board views the Mid Coast Forest District's pro-active response to the audit of the district's Small Business Forest Enterprise Program as positive. The district has proposed appropriate actions in response to the findings of significant non-compliance identified in the audit. The Board encourages the district to follow through on its proposed actions.

As provided by section 185 of the Act, the Board makes the following recommendations regarding the Mid Coast Forest District Small Business Forest Enterprise Program:

Recommendation 1 – Timber Harvesting

The Board recommends that the Mid Coast Forest District:

a) carry out its proposed plan to conduct post-harvest dive assessments to determine whether the results of the audit were pervasive or isolated, and to address the cause(s) of the findings. The Board recommends that the district's follow-up on causes of the findings should emphasize the prevention of excessive amounts of wood debris being deposited on the marine foreshore;

b) implement a program to monitor A-frame logging practices, which includes conducting post-harvest dive assessments to determine whether excessive amounts of wood debris have been deposited on the marine foreshore of A-frame logged cutblocks; and

c) adequately monitor contractor operations and follow up on non-compliant activities.

Recommendation 2- Road Construction

The Board recommends that the Mid Coast Forest District:

a) implement its plan of remedial actions to rehabilitate the stream identified in the finding of significant non-compliance;

b) ensure that road layouts and designs reflect correct stream classifications and are communicated effectively to contractors of the SBFEP; and

c) adequately monitor contractor operations and follow up on non-compliant activities.

Under section 186 of the Act, the Board requests that the district advise the Board by January 31, 2001 of the actions taken and the timing to address the above recommendations.

W.N. (Bill) Cafferata
Chair

November 2000

Forest Practices Board Compliance Audit Process

B. Forest Practices Board Compliance Audit Process

Background

The Forest Practices Board conducts audits of government's and agreement holder's compliance with the *Forest Practices Code of British Columbia Act* and regulations (the Code). The Board is given the authority to conduct these periodic independent audits by section 176 of the Act. Compliance audits examine forest planning and practices to determine whether or not they meet Code requirements.

The Board undertakes both "limited scope" and "full scope" compliance audits. A limited scope audit involves the examination of selected forest practices (e.g., roads, or timber harvesting, or silviculture) and the related operational planning activities. A full scope audit examines all operational planning activities and forest practices.

The Board determines how many audits it will conduct in a year, and what type of audits (limited or full scope), based on budget and other considerations. The Board audits agreement holders who have forest licences or other tenures under the *Forest Act* or the *Range Act*. The Board also audits government's Small Business Forest Enterprise Program (SBFEP) which is administered by Ministry of Forests district offices. Selection of agreement holders and district SBFEPs for audit is done randomly, using a computer program, to ensure a fair, unbiased selection of auditees.

Audit Standards

Audits by the Forest Practices Board are conducted in accordance with the auditing standards developed by the Board. These standards are consistent with generally accepted auditing standards.

The audits determine compliance with the Code based on criteria derived from the *Forest Practices Code of British Columbia Act* and its related regulations. Audit criteria are established for the evaluation or measurement of each practice required by the Code. The criteria reflect judgments about the level of performance that constitutes compliance with each requirement.

The standards and procedures for compliance audits are described in the Board's *Compliance Audit Reference Manual*.

Audit Process

Conducting the Audit

Once the Board selects an audit and decides on the scope of the audit (limited scope or full scope), the staff and resources required to conduct the audit and the period covered by the audit are determined. Board staff also meet with the party being audited to discuss the logistics of the audit before commencing the work.

All the activities carried out during the period subject to audit are identified. This includes activities such as the sites harvested or replanted and road sections built or deactivated during the audit period. The items that comprise each forest activity are referred to as a "population." For example, all sites harvested form the "timber harvesting population." All road sections constructed form the "road construction population." The populations are then sub-divided based on factors such as the characteristics of the sites and the potential severity of the consequences of non-compliance on the sites.

The most efficient means of obtaining information to conclude whether there is compliance with the Code is chosen for each population. Because of limited resources, sampling is usually relied upon to obtain audit evidence, rather than inspecting all activities.

Individual sites and forest practices within each population have different characteristics, such as the type of terrain or type of yarding. Each population is divided into distinct sub-populations on the basis of common characteristics (e.g., steep ground vs. flat ground). A separate sample is selected for each population (e.g., the cutblocks selected for auditing timber harvesting). Within each population, more audit effort (i.e., more audit sampling) is allocated to the sub-population where the risk of non-compliance is greater.

Audit work in the field includes assessments from helicopters and intensive ground procedures such as the measurement of specific features like road width. The audit teams generally spend two to three weeks in the field.

Evaluating the Results

The Board recognizes that compliance with the many requirements of the Code is more a matter of degree than absolute adherence. Determining compliance requires the exercise of professional judgment within the direction provided by the Board.

Auditors collect, analyze, interpret and document information to support the audit results. The audit team, comprised of professionals and technical experts, first determines whether forest practices are in compliance with Code requirements. For those practices considered to not be in compliance, the audit team then evaluates the degree to which the practices are judged not in compliance. The significance of the non-compliance is determined based on a number of criteria including the magnitude of the event, the frequency of its occurrence, and the severity of the consequences.

As part of the assessment process, auditors categorize their findings into the following levels of compliance:

Compliance – where the auditor finds that practices meet Code requirements.

Not significant non-compliance – where the auditor, upon reaching a non-compliance conclusion, determines that a non-compliance event, or the accumulation and consequences of a number of non-compliance events, is not significant and is not considered worthy of reporting.

Significant non-compliance – where the auditor determines that the event or condition, or the accumulation and consequences of a number of non-compliance events or conditions, is significant and is considered worthy of reporting.

Significant breach – where the auditor finds that significant harm has occurred or is beginning to occur to persons or the environment as a result of the non-compliance. A significant breach can also result from the cumulative effect of a number of non-compliance events or conditions.

Identification of a possible significant breach requires the auditor to conduct tests to confirm whether or not there has been a breach. If it is determined that a significant breach has occurred, the auditor is required by the *Forest Practices Board Regulation* to immediately advise the Board, the party being audited, and the Ministers of Forests, Energy & Mines, and Environment, Lands & Parks.

Reporting

Based on the above evaluation, the auditor then prepares the "Report from the Auditor" for submission to the Board. The party being audited is given a draft of the report before it is submitted to the Board so that the party is fully aware of the findings. The party is also kept fully informed of the audit findings throughout the process, and is given opportunities to provide additional relevant information and to ensure the auditor has complete and correct information.

Once the auditor submits the report, the Board reviews it and determines whether any party or person is potentially adversely affected by the audit findings. If so, the party or person must be given an opportunity to make representations before the Board decides the matter and issues a final report to the public and government. The representations allow potentially adversely affected parties to present their views to the Board.

At the discretion of the Board, representations may be written or oral. The Board will generally offer written representations to potentially adversely affected parties, unless the circumstances strongly support the need for an oral hearing.

The Board then reviews both the report from the auditor and the representations before preparing its final report, which includes the Board's conclusions and may also include recommendations, if appropriate.

If the Board's conclusions or recommendations result in newly adversely affected parties or persons, additional representations would be required.

Once the representations have been completed, the report is finalized and released: first to the auditee and then to the public and government.

Report from the Auditor

C. Report from the Auditor

1.0 Introduction

As part of the Forest Practices Board's 1999 compliance audit program, the Ministry of Forests' Small Business Forest Enterprise Program (SBFEP) in the Mid Coast Forest District was selected for audit from the population of Small Business Forest Enterprise Programs within the province. The Mid Coast SBFEP was selected randomly and not on the basis of location or level of performance.

The SBFEP is a program within which the Ministry of Forests awards timber sale licences to small business licensees. The Ministry of Forests and the individual licensees each have separate but inter-related roles and responsibilities within the program:

- The district manager is responsible for the overall management and performance of the SBFEP. This includes preparing and giving effect to forest development plans[i] and silviculture prescriptions;[ii] some road construction, maintenance and deactivation; as well as meeting silviculture obligations. The district manager can also choose to prepare and give effect to logging plans[iii] that SBFEP licensees must follow.
- The small business licensees who have been awarded timber sale licences (TSL holders) through the SBFEP have a number of legal responsibilities, as reflected in their timber sale licence and other permits (road permits and road use permits). These responsibilities may include preparing and obtaining approval of logging plans; some road construction, maintenance and deactivation; and ensuring that all operations, including harvesting and road construction, are carried out in compliance with the *Forest Practices Code of British Columbia Act*.

The district responsibilities and individual TSL holder responsibilities and performance are closely linked. The planning done by the district can impact directly on the TSL holders' ability to adequately carry out their responsibilities. The quality of a licence holder's timber harvesting activities can affect a district's ability to adequately carry out its work, such as meeting silviculture obligations, after logging is completed.

The Mid Coast SBFEP operates within the Mid Coast Forest District. The district covers an area on the mainland coast from Cape Caution in the south to Sheep Passage in the north. The major towns in the district are Bella Coola, Hagensborg and Bella Bella (refer to attached map).

The Mid Coast SBFEP has an allowable annual cut of 113,000 cubic metres, with operations scattered throughout the Mid Coast Forest District. The main harvesting system used is cable, including grapple yarding, A-frame, and hand-logging[iv] methods.

2.0 Audit Scope

The audit examined the planning and field activities related to timber harvesting and road construction, maintenance and deactivation for the period August 9, 1998, to August 31, 1999. This involved examining operational plans, such as forest development plans, silviculture

prescriptions and logging plans, that supported the activities examined during the audit period.

These activities were assessed for compliance with the *Forest Practices Code of British Columbia Act* and related regulations (the Code).

The activities carried out by the Mid Coast SBFEP during the audit period, and therefore subject to audit, were:

- harvesting of two cutblocks using grapple yarding
- harvesting of 46 cutblocks using water-based harvesting methods, including A-frame logging (15 cutblocks) and hand-logging (31 cutblocks)
- preparing and obtaining approvals for silviculture prescriptions for 24 cutblocks, including 12 conventional, 11 hand-log, and one A-frame cutblock, none of which were harvested during the audit period
- construction of seven sections of road totaling 4.8 kilometres
- preparing and obtaining approval for the layout and design of one road section totaling 0.6 kilometres
- maintenance and seasonal deactivation of approximately 65 kilometres of road, involving activities such as surfacing of roads and cleaning of culverts and ditches
- construction of two bridges and maintenance of seven bridges

Section 3.0 describes the results of the audit. The Board's *Compliance Audit Reference Manual, Version 4.0, May 1999* sets out the standards and procedures that were used to carry out the audit.

3.0 Audit Findings

Planning and practices examined

The audit work on selected cutblocks and roads included ground-based procedures, aerial assessments using helicopters and water-based assessments using a boat and scuba divers. The audit examined the following plans and practices:

- cable-harvesting of two cutblocks and their related operational plans
- harvesting of 34 cutblocks with A-frame or hand-logging methods and their related operational plans, including underwater assessments of two A-frame and five hand-logged cutblocks
- operational plans for ten cutblocks, including nine conventional cutblocks and one hand-log cutblock, where harvesting activity had not commenced but the related silviculture prescriptions were approved
- construction of seven sections of road totaling 4.8 kilometres
- road layout and design of one road section totaling 0.6 kilometres, where construction activity had not commenced

- maintenance and seasonal deactivation of approximately 44 kilometres of road
- construction of two bridges and maintenance of seven bridges

Findings

The audit found that, except for the two situations of significant non-compliance described below, the Mid Coast SBFEP complied, in all significant respects, with the timber harvesting, and road construction, maintenance and deactivation requirements of the Code. The non-compliance involved harvesting practices along the marine foreshore and road construction adjacent to a fish-bearing stream.

Timber Harvesting

The audit identified a situation of significant non-compliance with the Code during the underwater assessment of two cutblocks logged using an A-frame. The cutblocks were 2.1 hectares and 6.8 hectares in size, each spanning approximately 100 metres of the marine foreshore.

The non-compliance involved wood debris from harvesting being deposited along the marine foreshore. The approved logging plan for each of the cutblocks required that all debris from harvesting be left above the high-water mark.

The intertidal and subtidal zones of the marine foreshore of both cutblocks had extensive deposits of wood debris from harvesting. The debris ranged from small pieces of bark to branches, treetops and a few log-size pieces. Approximately 0.7 hectares of the ocean bed was affected.

The non-compliance is significant because such large concentrated volumes of debris have a smothering effect on marine organisms and plants, such as eelgrass, which live in and on the marine substrate and cannot tolerate these conditions. This debris will likely result in a loss of species within the affected area. In addition, there is the potential for similar impacts on the remaining 13 A-frame harvested blocks.

The main section of the Code to which the non-compliance relates is section 67(1) of the Act.

Road Construction

The audit identified a situation of significant non-compliance with the Code involving the construction of a road adjacent to a fish-bearing stream. The non-compliance relates to a section of road approximately 100 metres in length.

The non-compliance included constructing the road within the riparian management area of the stream, altering the stream banks and parts of the streambed for approximately 50 metres, and piling timber on the stream for approximately 40 metres. The non-compliance also included installing metal culverts where wood culverts were prescribed, building stream crossings outside approved timing windows, impeding fish passage, and causing sedimentation of the stream.

A stream assessment, initiated by the SBFEP approximately two months before construction of the road, classified the stream reach adjacent to the road as fish-bearing (S4). This classification was based on Code requirements that, in the absence of a fish inventory, such streams be classified as fish-bearing.

The road layout and design for this road, approved in 1996, did not identify the adjacent stream as fish-bearing and we were unable to confirm that this classification had been communicated to the contractor who carried out the road construction. The audit findings suggest that the contractor was not aware of the fish-bearing status of the stream.

In response to the audit findings, the Mid Coast SBFEP undertook a fish inventory for the stream, which confirmed the presence of fish in the stream. At a minimum, the stream provides habitat to fish that could contribute to a sport fishery in Elsie Lake. The size and type of fish present, the gradient characteristics of the stream, and the fish-bearing status of the downstream tributary stream, indicate that the stream could also provide habitat for anadromous fish such as coho salmon, and possibly steelhead trout. The stream is a direct tributary to Elsie Lake Creek, which is known to support coho salmon.

The non-compliance is significant because fish habitat was harmed as a result of the road construction activities.

The main sections of the Code to which the non-compliance relates are sections 4(2), 11(7)(a), 12(1)(b), and 13(1)(h) of the *Forest Road Regulation*. (Section 4.0 of this report includes further comments of relevance to this non-compliance).

Subsequent to the audit, the Mid Coast SBFEP removed introduced woody material from the stream and the road ditches.

4.0 Other Comments

The audit identified an issue with road layouts and designs approved before June 15, 1998. There are no Code requirements to review or update these layouts and designs to ensure they meet current Code requirements before road construction proceeds.

As of June 15, 1998, section 4(6)(a) of the *Forest Road Regulation* requires that all streams in, or adjacent to, a proposed road be assessed to determine the riparian classes of the streams before road construction can begin. Section 6(1)(e) of the regulation requires that road layouts and designs, prepared after June 15, 1998, include the results of these stream assessments. However, there is no legal requirement for layouts and designs, prepared before June 15, 1998, to be updated to meet current content requirements, or to include the results of riparian assessments prepared after that date. As a result, it is possible for a previously approved road layout and design to be inconsistent with a stream classification determined in accordance with Code requirements.

In many cases, planning in the SBFEP precedes the start of road construction activities by several years. The layout and design for the road identified in the audit findings and the pre-harvest silviculture prescription for the surrounding block were completed in early 1995, before the Code came into effect. The pre-harvest silviculture prescription described several creeks as ephemeral, but the layout and design did not identify the riparian classifications.

In early 1999, a stream adjacent to the road was classified as S4 (fish-bearing). Because the road layout and design was not updated, it was not consistent with Code requirements for road construction practices adjacent to a stream of that classification. A number of older approved road layouts and designs could similarly be inconsistent with current stream assessments. There is the potential that riparian areas and streams could be harmed if such roads are constructed without regard to the Code's riparian requirements.

The audit did not find the Mid Coast SBFEP to be in non-compliance with the Code because the district had initiated a stream assessment before construction of the road identified in the audit findings, as required by section 4(6)(a) of the *Forest Road Regulation*. In addition, there is no requirement for this assessment to be incorporated into the previously approved plans for road construction.

5.0 Audit Opinion

In my opinion, except for the significant non-compliance described below, the timber harvesting, and road construction, maintenance and deactivation activities carried out by the Mid Coast SBFEP, from August 9, 1998, to August 31, 1999, were in compliance, in all significant respects, with the requirements of the Code as of August 1999.

As described in Section 3, the audit identified the following situations of significant non-compliance:

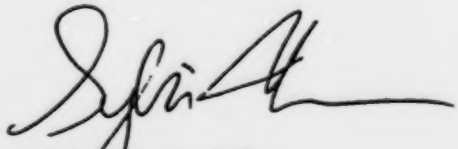
- On the A-frame harvesting blocks examined, timber harvesting practices did not comply with the approved logging plans. Wood debris was deposited along the marine foreshore of each cutblock, affecting approximately 0.7 hectares of the ocean bed. The non-compliance was determined to be significant because of the likelihood that the debris harmed certain species of marine organisms, such as eelgrass, and because of the potential for similar impacts on other A-frame harvested cutblocks.

- On one road section, road construction did not comply with the Code. The road was constructed within the riparian management area of a fish-bearing stream, altered the stream banks and parts of the streambed and resulted in sedimentation of the stream. In addition, timber was piled on the stream and a culvert impeded fish passage.

Without further qualifying my opinion, I also draw attention to section 4.0 of this report, which describes the lack of Code requirements to include the results of certain stream classifications in road layouts and designs approved before June 15, 1998.

In reference to compliance, the term "in all significant respects" recognizes that there may be minor instances of non-compliance that either may not be detected by the audit, or that are detected but not considered worthy of inclusion in the audit report.

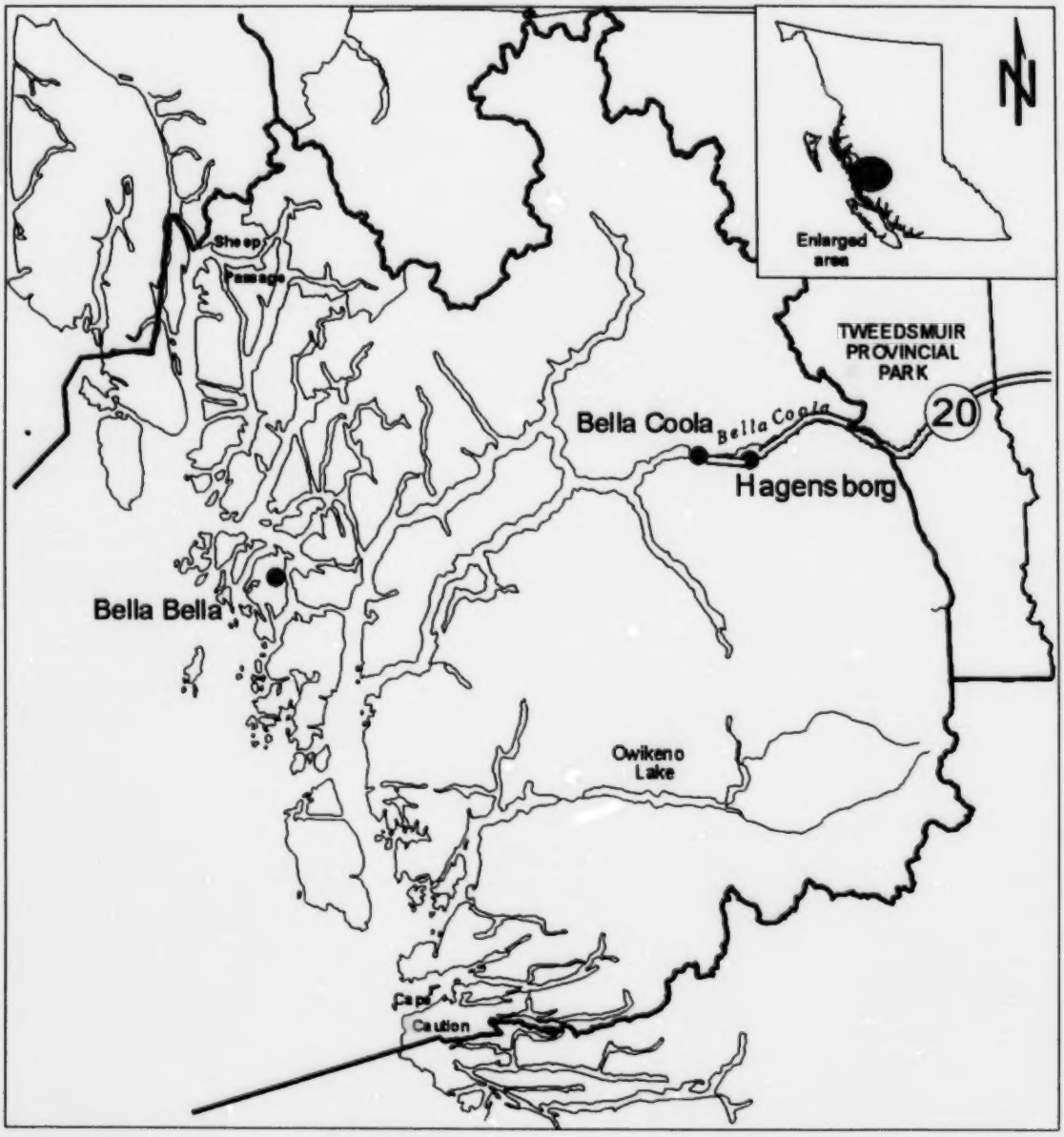
Sections 2.0 and 3.0 of this report from the auditor describe the audit work that formed the basis for reaching this qualified opinion. The audit was conducted in accordance with the auditing standards of the Forest Practices Board. Such an audit includes examining sufficient forest planning and practices to support an overall evaluation of compliance with the Code.



Sylvi Holmsen, RPF
Auditor
Forest Practices Board

Victoria, British Columbia
September 25, 2000

Audit of Mid-Coast
Small Business Forest Enterprise Program



Mid-Coast Forest District

Highway

(Map not to scale)

Endnotes

[i] A forest development plan is an operational plan that provides the public and government agencies with information about the location and scheduling of proposed roads and cutblocks for harvesting timber over a period of at least five years. The plan must specify measures that will be carried out to protect forest resources (including water, fisheries, and other forest resources). It must also illustrate and describe how objectives and strategies established in higher level plans, where they have been prepared, will be carried out. Site specific plans are required to be consistent with the forest development plan.

[ii] A silviculture prescription is a site-specific operational plan that describes the forest management objectives for an area to be harvested (a cutblock). The silviculture prescriptions examined in the audit are required to describe the management activities proposed to maintain the inherent productivity of the site, accommodate all resource values including biological diversity, and produce a free growing stand capable of meeting stated management objectives. Silviculture prescriptions must be consistent with forest development plans that encompass the area to which the prescription applies.

[iii] A logging plan is an operational plan that details how, when, and where timber harvesting and road construction activities will take place in a cutblock, in accordance with the approved silviculture prescription and forest development plan for the area. Information about other forest resource values, plus all current field information for the area, must be clearly shown in the logging plan. The requirement to prepare logging plans was repealed on June 15, 1998, but may be in effect in limited circumstances. Logging plans approved before June 15, 1998 continue to be in effect until timber harvesting is completed.

[iv] The Mid Coast SBFEP provides work to a number of local SBFEP licensees through A-frame and hand-logging timber sales along the coast. A-frame logging is a method of harvesting using a yarder on a barge to yard logs from a cutblock into the ocean. Hand-logging relies on hand power and a boat to yard logs from the shore into the water. A-frame and hand log sales are generally less than ten hectares in size.

The Code does not specifically address these types of marine foreshore operations or specify measures to protect the marine resources other than marine sensitive zones. Section 67(1) of the *Forest Practices Code of British Columbia Act* requires licensees to carry out harvesting in accordance with any approved operational plans.

The Mid Coast SBFEP has, in consultation with the Department of Fisheries and Oceans Canada, developed and implemented a process by which potential marine foreshore harvest sites are assessed by divers and recommendations to manage and conserve the marine resources are incorporated into approved operational plans.